The Federation of Annunciation Catholic Schools

Whistleblowing Policy

Approved by: Governing Body		**Date: September 2026**
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Whistleblowing policy

Introduction

Wrongdoing at work
This procedure is designed to deal with disclosure of information by an employee* which relates to some safeguarding concern, danger, bribery, corruption, fraud or other unlawful or unethical conduct in the workplace. Employment legislation governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on bad practice from being subjected to any detriment or from being unfairly dismissed as a result. This procedure is available to all employees who discover something they feel that they should pass on in the interests of the public. All types of wrongdoing are included whether they are acts committed by fellow employees, faults in Federation procedures or oversights which should be rectified. The procedure should be used even in the event that the act or omission causing you concern has finished or has not yet started. Employees* have a duty of care to report any wrongdoing at work.

Availability of the Policy
*As well as its designation to be used by an employee to disclose suspected wrongdoing, the policy should also be used, if necessary, by individuals working at the Federation under different arrangements, such as agency workers, contractors, self-employed staff and volunteers.

Context
The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for the worker to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The worker has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.
This policy forms part of the list of documents which, with regard to KCSIE, must be introduced and explained to staff during their safeguarding induction.

Safeguarding
Nothing within this policy is intended to prevent staff from complying with their statutory obligations in accordance with the DfE guidance documents, *Keeping Children Safe in Education (KCSIE)* or *Working Together to Safeguard Children (WTSC)*. In particular:

- **Safeguarding / Child Protection Policy**: You should raise any initial safeguarding concerns with the Designated Safeguarding Lead in accordance with the college's Child Protection and Safeguarding Policy and Procedures.
- **Whistleblowing Policy:** You should follow this procedure to raise concerns about poor or unsafe safeguarding practices at the Federation or potential failures by the Federation or staff

to properly safeguard the welfare of pupils if you are concerned that the Federation Child Protection and Safeguarding Policy and Procedures are not being followed correctly.

- **Children's Social Care**: In exceptional circumstances, or if at any point there is a risk of immediate serious harm to a child, a referral should be made to Barnet MASH immediately.

Grievances
This procedure is not designed to be used where you have a complaint relating to your personal circumstances in the workplace. The Grievance Policy should be used in such a situation.

Detriment
Provided that this procedure is used appropriately and correctly you will not suffer any detriment as a result of reporting the wrongdoing. A failure to follow this procedure may, however, make the disclosure unreasonable and the protection given to you by this procedure may be lost. Maliciously or knowingly making a false allegation is a disciplinary offence.

Stage one

Procedure
You should disclose the suspected wrongdoing first to your immediate manager. In the event that your manager is involved in the suspected wrongdoing, you are entitled to proceed directly to Stage Two of this procedure. In the event that the Headteacher is involved in the suspected wrongdoing, you should take your concern to the Chair of Governors.

Response
You can expect a response detailing to whom the disclosure has been notified or any action taken within seven days of your manager becoming aware of the disclosure.

Stage two

Procedure
If no response is forthcoming after seven days or if your manager is involved in the suspected wrongdoing, you shall be entitled to notify the Headteacher, as appropriate.

Response
You can expect a response detailing any action taken within seven days of the Headteacher becoming aware of the disclosure.

Stage three

Procedure
If no such response is forthcoming you should once more inform Headteacher of the disclosure or, if the Headteacher is involved in the suspected wrongdoing, once more inform the Chair of Governors of your concern.

Stage four

Outside organisations
If you do not receive a response within seven days you shall be entitled to notify a relevant and appropriate body outside the college, which may include:

- Local Authority Designated Officer;
- Barnet MASH
- Health and Safety Executive;

- Environment Agency;
- Information Commissioner's Office;
- Department for Education (DfE);
- Department for Business, Enterprise and Regulatory Reform;
- Police;
- Office for Standards in Education, Children's Services and Skills (Ofsted);
- Channel Police Practitioner.

Further notes

Bypassing the procedure

In extreme circumstances you will have the right to raise your concern directly with a relevant and appropriate outside body, without first having followed the stages above. This may, however, cause damage to the Federation and its reputation as well as constitute a breach of your own duty of confidentiality towards the Federation and this action should only be taken in extreme circumstances and after careful thought.

Extreme circumstances

The Federation will consider extreme circumstances exist where you have a reasonable belief that

- The Federation will subject you to detriment if you inform your manager or the Chair of Governors in accordance with Stage one above or if you inform the Headteacher in accordance with Stage two or Stage three;
- a cover-up is being mounted by the college;
- a disclosure made previously to your manager, the Headteacher or the Chair of Governors in accordance with the stages above has not prompted a satisfactory response.

The media

Even where extreme circumstances are thought to exist, you should under no circumstances approach a commercial body or the media with details of the suspected wrongdoing. If you approach any such body and/or where your concern is disclosed for personal gain, the Federation may consider this to be gross misconduct and immediate disciplinary action may be taken against you.

Confidentiality and Feedback

The Federation is committed to treating disclosures consistently and fairly. Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially (unless the Federation is required by law to break that confidentiality). Feedback on timings and actions will be given, where possible and appropriate, so that those raising concerns understand how their disclosure has been handled and dealt with. The outcome of the investigation will be reported back to the employee who raised the issue.

Queries

If you have any queries about this procedure, you should contact the Headteacher. If you would like free independent advice and support about concerns over how well child protection concerns are being handled, you can contact the NSPCC Whistleblowing Advice Line. Call 0800 028 0285 or email help@nspcc.org.uk for further information.